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**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

ATLAS DATA PRIVACY
CORPORATION, *as assignee of*
individuals who are Covered Persons,
PATRICK COLLIGAN and PETER
ANDREYEV,

Plaintiffs,

v.

STERLING DATA COMPANY LLC,
RICHARD ROES 1-10, *fictitious names of*
unknown individuals and ABC COMPANIES
1-10, *fictitious names of unknown entities,*

Defendants.

Case No.: 1:25-cv-09963-HB

**APPLICATION FOR EXTENSION OF
TIME TO ANSWER, MOVE OR
OTHERWISE REPLY PURSUANT TO
LOCAL CIVIL RULE 6.1(b)**

Pursuant to Local Civil Rule 6.1(b) of the United States District Court for the District of New Jersey, the undersigned hereby respectfully makes the within application on behalf of Defendant Sterling Data Company LLC (“Sterling” or “Defendant”) for a Clerk's Order extending the time within which Sterling may answer, move or otherwise reply to the Complaint filed by the Plaintiffs herein for fourteen (14) days to and including July 2, 2025.

Sterling received a copy of the Complaint filed by Plaintiffs in the Superior Court of New Jersey, Union County, Law Division, on May 13, 2025—the Complaint was not properly served

and, in submitting this application, Sterling reserves its challenges to personal jurisdiction and any attempted service on Sterling. The Notice of Removal was filed on June 11, 2025. *DE I*. Pursuant to Federal Rule of Civil Procedure 81(c)(2)(C), the initial period of time within which Defendant is to respond to the Complaint expires on June 18, 2025.

No prior requests for extensions of time to respond to the Complaint have been made by Defendant in this action and no previous extensions have been obtained.

REED SMITH LLP

/s/ David G. Murphy
David G. Murphy, Esq.

Dated: June 13, 2025